

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

MILDRED FIGUERAS FIGUEROA
Debtor(s)

CASE NUMBER: 09-02380 SEK

CHAPTER 13 (ASSET CASE)

DEBTORS REPLY TO DORAL BANK
MOTION FOR RELIEF OF STAY UNDER 362

TO THE HONORABLE COURT:

COMES now Debtor(s) represented by the undersigned counsel and respectfully Allege(s) and Pray(s) as follows:

1. That on April 6th, 2011, the creditor Doral Bank filed a Motion for Relief From Stay Under 362 based on the fact that debtor was in arrears in the first mortgage loan in the amount of \$4,299.50.

2. Debtors will cure arrears on or before the 362 hearing.

3. Based on the abovementioned, it is debtor's contention that Doral Bank motion turns into a moot one.

WHEREFORE, it is respectfully requested from this Honorable Court to GRANT the present Motion, therefore deny Doral Bank Motion for Relief of Stay under 362.

In San Juan, Puerto Rico, this 13th, day of April 2011.

RESPECTFULLY SUBMITTED

/S/Marilyn Valdes Ortega

MARILYN VALDES ORTEGA

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I HEREBY CERTIFY: That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

09-02380-SEK13 Notice will be electronically mailed to:

JOSE RAMON CARRION MORALES
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MONSITA LECAROS ARIBAS
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MARILYN VALDES ORTEGA on behalf of Debtor MILDRED FIGUERAS FIGUEROA
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I HEREBY CERTIFY: That I have mailed by regular mail to all creditors listed.

09-02380-SEK13 Notice will not be electronically mailed to:

CITIFINANCIAL
ONE CITIBANK DRIVE
SUITE 201
SAN JUAN, PR 00936

INTERNAL REVENUE SERVICE
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SAN JUAN, PR 00918-1693

CITIFINANCIAL
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AMERICAN INTL BUILDING
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HATO REY, PR 00918

DEPARTAMENTO DEL TRABAJO
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RELIABLE FINANCIAL SERVICES
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FEDERAL LITIGATION DEPT OF JUSTICE
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CALLE LOIZA 1863
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FIRST BANK PUERTO RICO
BANKRUPTCY DIVISION
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